

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

H. CRISTINA CHEN-OSTER; SHANNA ORLICH;  
ALLISON GAMBA; and MARY DE LUIS,

Plaintiffs,

-against-

GOLDMAN SACHS & CO. and THE GOLDMAN  
SACHS GROUP, INC.,

Defendants.

No. 10-cv-6950-AT-RWL

**DECLARATION OF ADAM T. KLEIN IN FURTHER SUPPORT OF PLAINTIFFS’  
UNOPPOSED MOTIONS FOR ATTORNEYS’ FEES AND  
COSTS AND SERVICE AWARDS**

I, Adam T. Klein, declare:

1. I am a Partner at Outten & Golden LLP (“O&G”), Co-Lead Counsel, with Lief Cabraser Heimann and Bernstein, LLP (“LCHB”) (together, “Class Counsel”), in this action. I submit this declaration in support of Plaintiffs’ Unopposed Motions for Attorneys’ Fees and Costs and Service Awards. I have personal knowledge of the facts set forth herein and could competently testify to them if called as a witness.

2. In the approximately fifteen weeks since Plaintiffs’ July 12, 2023 motion for attorneys’ fees and costs, Class Counsel have spent substantial additional time (i) responding to and, if necessary, investigating inquiries from Class members and other women who work or worked at Goldman Sachs regarding the Settlement; (ii) overseeing the work of the Settlement Administrator; (iii) conferring with Goldman Sachs’s counsel regarding administration of the Settlement, including supplemental notice to the 45 supplemental Class Members; and (iv) preparing to secure final approval of the Settlement.

3. As laid out in the chart below, attorneys, paralegals, and staff at Outten & Golden have spent an additional 369.9 hours on these efforts since July 12, amounting to an additional lodestar of \$212,453.

<b>Timekeeper</b>	<b>Role</b>	<b>Current Title</b>	<b>Hours</b>	<b>Fees</b>
Sabine Jean	Attorney	Associate	179.7	\$80,865
Christopher M. McNerney	Attorney	Partner	68.8	\$44,720
Adam T. Klein	Attorney	Partner	41.6	\$47,840
Amy Maurer	Attorney	Associate	20.8	\$8,320
Christopher Truong	Support Staff	Paralegal	15.8	\$5,135
Cara E. Greene	Attorney	Partner	14.6	\$13,870
Michael Danna	Attorney	Associate	13.4	\$6,365
Genavieve H Koyn	Support Staff	Paralegal	11.9	\$3,868
Michaela Dougherty	Support Staff	Paralegal	1.1	\$385
Jennifer LaMarch	Support Staff	Legal Administrator	0.8	\$280
Tracee A. Manettas	Support Staff	Paralegal	0.8	\$280
Justin Swartz	Attorney	Partner	0.4	\$460
Makaria S. Yami	Support Staff	Paralegal	0.1	\$33
Napoleon Zapata	Support Staff	Paralegal	0.1	\$33

4. In sum, combined with our co-counsel, Class Counsel have spent an additional 580.3 hours of attorney, paralegal, and staff time on this litigation, amounting to an additional lodestar of \$367,170.50.

5. The total time Class Counsel have now spent on this litigation to date is 71,944.2 hours, or \$47,285,666.50 in lodestar.<sup>1</sup> The requested attorneys' fees represent a multiplier of 1.52, which is unchanged since Plaintiffs' prior submission.

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<sup>1</sup> In Plaintiffs' July 12 submission, Class Counsel inadvertently included approximately 147.7 hours, reflecting \$115,820.50 in lodestar, on a related matter. These hours and lodestar amounts have been removed from the updated totals. Additionally, \$205.69 in costs were removed from the updated totals.

6. At the time of Plaintiffs' request for fees and costs, Class Counsel estimated an additional \$20,000 in anticipated expert costs relating to the negotiation and administration of the settlement. Class Counsel have now received an additional final expert invoice for \$18,985.

7. Apart from this expense, Class Counsel have incurred additional out-of-pocket expenses of \$15,501.24 for late reported mediation fees, document managing/hosting, and travel.

8. In light of this final accounting, Class Counsel update their request for actual litigation costs to \$6,684,806.15.

**Exhibits**

9. Attached as **Exhibit 1** is a copy of a recent court filing in the litigation *In re LTL Mgmt. LLC*, Bankr. 21-30589, ECF No. 2324 (D.N.J. May 20, 2022).

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I declare under penalty of perjury under the laws of the United States and the State of New York that the foregoing is true and correct to the best of my knowledge and that this declaration was executed in New York, NY on October 27, 2023.

/s/ Adam T. Klein  
Adam T. Klein